

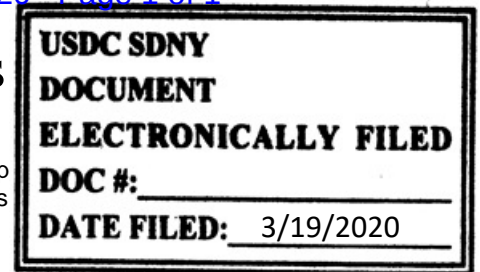
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March 19, 2020



VIA ECF

Hon. Stewart D. Aaron
United States Magistrate Judge
United States District Court
500 Pearl St.
New York, NY 10007

Application GRANTED. SO ORDERED.

Dated: March 19, 2020

A handwritten signature in blue ink, appearing to read "Att of an".

Re: Pareja v. 184 Food Corp. (d/b/a Bravo Supermarket), et al.;
Case No. 18-cv-5887-SDA

Dear Judge Aaron:

This office represents Plaintiff in the above-referenced matter. I write jointly with counsel for Defendants 0113 Food Corp., Giovanni Marte, Jose Marte, and Gustavo Marte ("Appearing Defendants") to request an extension of time to complete discovery. This is the third such request; all previous requests were granted. On February 27, 2020, this Court granted such an extension until March 30, 2020. On February 28, 2020, Plaintiff sent Notices of Deposition to the Appearing Defendants originally scheduled for the week of March 23, 2020.

Given the unfolding COVID-19 outbreak and social distancing guidelines, conducting an in-person deposition at this time would be inadvisable. Various factors render a video deposition impractical, including the Appearing Defendants' need for a translator. As such, we respectfully request that the deadline for completion of discovery be extended by 30 days for the purpose of conducting these contemplated depositions, and that this Court consider extending it further should the nationwide health crisis remain unresolved at that time.

Respectfully Submitted,

/s

Clela A. Errington, Esq.

MICHAEL FAILLACE & ASSOCIATES, P.C.

Attorneys for Plaintiff